

EXHIBIT J

From: Ghazarian, Colette A
Sent: Wednesday, August 28, 2024 6:47 PM
To: Joseph Saveri; Cadio Zirpoli; Christopher Young; Holden Benon; Kathleen McMahon; Aaron Cera; Matthew Butterick; BClobes@caffertyclobes.com; ASweatman@caffertyclobes.com; David Straite; akeller@dicellolevitt.com; BrianO@dicellolevitt.com; ajensen@saverilawfirm.com; Rya Fishman; julwick@dicellolevitt.com; Ruby Ponce; Elissa A. Buchanan; Mohammed Rathur
Cc: Ghajar, Bobby A.; Weinstein, Mark; Hartnett, Kathleen; Lauter, Judd; Stameshkin, Liz; Dunning, Angela L.; Alvarez, Jessica; Biksa, Liene
Subject: RE: Kadrey et al v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC / Depositions of Plaintiffs

Counsel,

We are following up on my August 23 email and your separate responses on Monday regarding Plaintiffs' deposition availability. We would like to make flight, hotel, and court reporter arrangements, and, given the fast-approaching close of fact-discovery, need to firm up deposition dates now.

We wish to immediately confirm that the depositions of **Andrew Sean Greer, Sarah Silverman, Laura Lippman, Christopher Golden, Junot Diaz, and Lysa TerKeurst** may proceed on the dates in the deposition notices served last week.

Separately, please provide deposition availability for **Richard Kadrey, David Henry Hwang, Ta-Nehisi Coates, and Jacqueline Woodson** between September 6 to 28, including their locations.

At this time, Meta will be withdrawing its deposition notice for **Matthew Klam**.

Finally, in follow up to our question, please confirm where Mr. Kadrey will be made available for his deposition. We understand he resides in Pittsburg and are prepared to take his deposition proximate to his residence, but if counsel is prepared to make him available in San Francisco, we can make preparations to take his deposition there.

We ask for your confirmation on scheduling by Friday COB.

Thank you,
Colette

Colette Ghazarian

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Pronouns: she, her, hers

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From: Ghazarian, Colette A

Sent: Friday, August 23, 2024 5:59 PM

To: Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Holden Benon <hbenon@saverilawfirm.com>; Kathleen McMahon <KMcmahon@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; BClobes@caffertyclobes.com; ASweatman@caffertyclobes.com; David Straite <dstraite@dicellolevitt.com>; akeller@dicellolevitt.com; BrianO@dicellolevitt.com

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Subject: Kadrey et al v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC / Depositions of Plaintiffs

Counsel,

We are writing regarding the depositions of Plaintiffs. Attached are Notices of Deposition of Andrew Sean Greer, Sarah Silverman, Laura Lippman, Matthew Klam, Christopher Golden, Junot Diaz, and Lysa TerKeurst. While we have selected dates for each witness's deposition, if a witness is unavailable on the date noticed for his/her deposition, please let us know as soon as possible and provide alternative dates.

As we were unsure of where Ms. TerKeurst resides, we have noticed her deposition in New York, where Mr. TerKeurst's counsel is located. Please let us know whether Ms. TerKeurst will be made available in New York or, otherwise, where she resides or will be made available.

Similarly, please let us know where Richard Kadrey will be made available to be deposed, as we are also unsure about where he resides.

Thank you,

Colette

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